

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

CHRISTIAN S. STRONG, *et al.*,

Case No. 1:03-cv-00383

Plaintiffs,

Judge Michael H. Watson

-v-

VERDICT FORM

**U-HAUL CO. OF MASSACHUSETTS,
INC., *et al.*,**

Defendants.

MEMBERS OF THE JURY

Please consider each one of the following questions carefully and have your foreperson place a checkmark or other mark of response in the appropriate space for each question to indicate your collective response. Remember that you must unanimously agree on each of your answers.

CAUSES OF ACTION

With respect to Claim 1, statutory defective product design, we hereby find for

Plaintiffs _____ or U-Haul International, Inc. ✓

Plaintiffs _____ or U-Haul Co. of
Massachusetts and Ohio, ✓
Inc.

Please sign and date indicating that you unanimously agree on the above response:

X _____
Foreperson

X _____

X _____

X _____

X _____

X _____

X _____

X _____

Date: 2/9/07

With respect to Claim 2, statutory supplier liability/failure to warn, we hereby find for

Plaintiffs _____ or U-Haul International, Inc. ✓

Plaintiffs _____ or U-Haul Co. of
Massachusetts and Ohio,
Inc. ✓

Please sign and date indicating that you unanimously agree on the above response:

X _____
Foreperson

X _____

X _____

X _____

X _____

X _____

X _____

X _____

Date: 2/9/07

With respect to Claim 3, statutory failure to warn, we hereby find for

Plaintiffs ✓ or U-Haul International, Inc. _____

Plaintiffs ✓ or U-Haul Co. of
Massachusetts and Ohio, Inc. _____

Please sign and date indicating that you unanimously agree on the above response:

X _____
Foreperson

X _____

X _____

X _____

X _____

X _____

X _____

X _____

Date: 2/9/07

With respect to Claim 4, negligent design, we hereby find for

Plaintiffs _____ or U-Haul International, Inc. ✓

Plaintiffs _____ or U-Haul Co. of
Massachusetts and Ohio,
Inc. ✓

Please sign and date indicating that you unanimously agree on the above response:

X _____
Foreperson

X _____

X _____

X _____

X _____

X _____

X _____

X _____

Date: 2/9/07

With respect to Claim 5, negligent failure to warn, we hereby find for

Plaintiffs

✓

or

U-Haul International, Inc.

Plaintiffs

✓

or

U-Haul Co. of
Massachusetts and Ohio,
Inc.

Please sign and date indicating that you unanimously agree on the above response:

X _____
Foreperson

X _____

X _____

X _____

X _____

X _____

X _____

X _____

Date: 2/9/07

With respect to Claim 6, negligence/failure to maintain, we hereby find for the

Plaintiffs _____ or U-Haul International, Inc. ✓

Plaintiffs _____ or U-Haul Co. of
Massachusetts and Ohio,
Inc. ✓

Please sign and date indicating that you unanimously agree on the above response:

X _____
Foreperson

X _____

X _____

X _____

X _____

X _____

X _____

X _____

Date: 2/9/07

CONTRIBUTORY NEGLIGENCE

If any of your answers to the questions above was "Yes," did the Defendants prove by a preponderance of the evidence that Mindy Swegles Strong was negligent in any way that contributed to her injuries?

YES ✓

NO _____

If the answer to the prior question was "Yes," please assign a percentage of fault to each of the following parties for her injuries:

Plaintiff Mindy Swegles Strong

45 %

Defendant U-Haul International, Inc.

25 %

Defendant U-Haul Co. of Massachusetts and Ohio, Inc.

30 %

TOTAL

100 %

Please sign and date indicating that you unanimously agree on the above response:

X _____
Foreperson

X _____

X _____

X _____

X _____

X _____

X _____

X _____

Date: 2/9/07

DAMAGES

If you found in favor of the Plaintiffs on any cause of action, what sum of money will fairly and reasonably compensate each Plaintiff for the damages sustained as a result of this accident?

A) Plaintiff Mindy Swegles Strong:

(i) Past medical, hospital, and related expenses

\$ 168,695

(ii) Past wages lost and future loss of earning capacity

\$ 217,000

(iii) Past and future pain, suffering, disability, and loss of the enjoyment of previously pleasurable activities of daily living

\$ 1,136,650

(iv) Compensation for past and future caregiving services and therapies

\$ 460,000

Please sign and date indicating that you unanimously agree on the above response:

X _____
Foreperson

X _____

X _____

X _____

X _____

X _____

X _____

X _____

Date: 2/9/07

B) Plaintiff Christian Strong:

(i) Past medical, hospital, and related expenses

\$ 27,777.

(ii) Past wages lost

\$ 7,400.

(iii) Past and future pain, suffering, disability,
and loss of the enjoyment of previously
pleasurable activities of daily living

\$ 76,222.

Please sign and date indicating that you unanimously agree on the above response:

X _____
Foreperson

X _____

X _____

X _____

X _____

X _____

X _____

X _____

Date: 2/9/07

C) Plaintiff Brian Hunzicker:

(i) Past medical, hospital, and related expenses

\$ 18,348

(ii) Past wages lost

\$ 1,124

(iii) Past and future pain, suffering, disability,
and loss of the enjoyment of previously
pleasurable activities of daily living

\$ 21,444

Please sign and date indicating that you unanimously agree on the above response:

X _____
Foreperson

X _____

X _____

X _____

X _____

X _____

X _____

X _____

Date: 2/9/07

PUNITIVE DAMAGES

If you found that Plaintiffs were entitled to compensatory damages, did the Plaintiffs prove by clear and convincing evidence that punitive damages should be imposed against one or both Defendants in this case?

YES ✓

NO _____

Please sign and date indicating that you unanimously agree on the above response:

X _____
Foreperson

X _____

X _____

X _____

X _____

X _____

X _____

X _____

Date: 2/9/07

If your answer to the previous question was "Yes," please enter the amount of punitive damages that should be awarded to Plaintiffs by each Defendant:

U-Haul International, Inc.	\$ 220,800
U-Haul Co. of Massachusetts and Ohio, Inc.	\$ 220,800

Please sign and date indicating that you unanimously agree on the above response:

X _____ Foreperson	X _____
X _____	X _____
X _____	X _____
X _____	_____
X _____	_____
Date: 2/9/07	